



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
CITY VIEW PLAZA II BUILDING, 7TH FLOOR
ROUTE 165 GUAYNABO, PUERTO RICO 00968

APR 24 2018

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Article Number: 7017 1450 0001 0607 4643

Mrs. Irma López
Executive Director
Environmental Compliance, Health, and Occupational Safety
Puerto Rico Aqueduct and Sewer Authority
P.O. Box 7066
San Juan, Puerto Rico 00916-7066

**Re: Assessment Inspection
Guanica Wastewater Treatment Plant
NPDES Permit Number PR0020486**

Dear Mrs. López:

On April 4, 2019, the United States Environmental Protection Agency (EPA) conducted an Assessment Inspection at the above referenced Puerto Rico Aqueduct and Sewer Authority's (PRASA) Wastewater Treatment Plant (WWTP) located in Guanica, Puerto Rico. The Assessment Inspection was conducted pursuant the authority contained in Section 308 of the Clean Water Act, 33 U.S.C. § 1251 et seq., 40 CFR § 122.41(a)(2), & 1,2, 3, and in accordance with Agency wide acceptable guidance and procedures. PRASA was represented by Amalio Quiros, Plant operator; Edgardo Jorge, Plant Operator; Rosalía Torres, Compliance Specialist; Yeisy Marcucci, Plant Supervisor; José Rodríguez, Preventive Maintenance Supervisor; Pedro Camacho, Preventive Maintenance Manager; Alexis Irizarry, Preventive Maintenance Director; Juan Vargas, Compliance Manager; and Bruce León, Regional Sub Director.

Enclosed you will find the inspection report. The Assessment Inspection report indicates the noncompliance items or deficiencies which should be corrected to ensure compliance with the Clean Water Act and the National Pollutant Discharge Elimination System ("NPDES") Permit.

Should you have any questions feel free to contact Miguel A. Batista, Environmental Engineer, at (787) 977-5823.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jaime A. Geliga", is written over the typed name.

Jaime A. Geliga, Chief
Municipal Water Program Branch
Caribbean Environmental Protection Division

Enclosure

cc. Annette Feliberty, EQB (w/Enclosures)
Bruce León, PRASA

NPDES Inspection Report

ASSESSMENT INSPECTION

Facility Name: Guanica WWTP
NPDES Permit Number: PR0020486
Permit Status: Active (Expiration Date: 01/31/2023)
PRASA representatives: Amalio Quiros, Plant Operator
Edgardo Jorge, Plant Operator
Rosalía Torres, Compliance Specialist;
Yeisy Marcucci, Plant Supervisor;
José Rodríguez, Preventive Maintenance Supervisor;
Pedro Camacho, Preventive Maintenance Manager;
Alexis Irizarry, Preventive Maintenance Director;
Juan Vargas, Compliance Manager;
Bruce León, Regional Sub Director.
EPA Inspector: Miguel A. Batista, Environmental Engineer

I. BACKGROUND

An Assessment Inspection was conducted on April 4, 2019 at the Guanica WWTP. The Assessment Inspection consisted of an opening interview to discuss the purpose of the inspection and to request information about the facility (particularly of previous inspection findings), a site tour to overview operational conditions, and a review of Form AAA-48 to identify equipment/units in poor operational conditions or not in service at the time of the EPA's Assessment Inspection.

II. FACILITY DESCRIPTION AND OPERATOR'S LICENCE STATUS

The Guanica WWTP is a secondary treatment plant. The facility consists of two treatment modules. One module is a 0.5 MGD activated sludge conventional package plant (Old Plant), and the second module is a 1.25 MGD Biological Nutrient Removal (BNR) treatment plant (New Plant). The New Plant was in service. The Old Plant was out of service.

At the time of the inspection, Amalio Quiros and Edgardo Jorge were acting as Plant Operators for the Guanica WWTP. Mr. Quiros has obtained the certification as a WWTP Operator Level IV, license # 2099, which expires on April 21, 2020. Mr. Jorge has obtained the certification as a WWTP Operator Level IV, license # 2932, which expires on May 22, 2020.

III. COMPLIANCE STATUS WITH CONSENT DECREE (CD)

As part of the Preventive Maintenance Program (PMP) minimum requirements required by the CD (CD 3:15-cv-02283-JAG, signed on September 15, 2015), the Guanica WWTP is implementing the program (Appendix U) with some deficiencies.

IV. INSPECTION FINDINGS

- A. The status of equipment/units identified in poor operational conditions or not in service at the time of the EPA's Compliance Evaluation Inspection (CEI) conducted on June 11, 2018 were identified and verified at the time of the Reconnaissance Inspection (RI) conducted on December 19, 2018 are summarized in the following table: (copy of the AAA-48 Form was provided by PRASA at the time of the CEI)

Equipment Unit (SAP #)	Date Reported Out of service	Work Order #	Type of Failure	Status at the time of the Assessment Inspection
1. Motor-Blower # 1 (old plant) (1116116)	04/20/2018	3847	Malfunction.	Corrected on 03/04/2019.
2. Motor-Blower # 3 (old plant) (208951)	06/09/2017	10469926	Got tripped.	Corrected on 03/01/2019.
3. Control Panel PP1 (MDP) (1112479)	04/26/2018	10518970	Working on automatic mode.	Corrected on 02/20/2019.
4. Booster Pump Potable Cl2 (1133665)	01/12/2018	38823	Malfunction.	Eliminated on 02/21/2019.
5. Exhaust Fan Chlorine Room (11124753)	04/25/2018	38849	Malfunction.	Eliminated on 02/22/2019.
6. Pump/Motor NPW # 1 (1136537)	03/25/2017	10453999	Malfunction.	Not corrected. Expected Date: July/2019.
7. NPW Pumps Panel (1114177)	06/03/2018	38860	Malfunction.	Not corrected. Expected Date: July/2019.
8. Pump/Motor Degritter # 1 * (208765)	12/18/2017	10330755	Malfunction.	PO 641003622. Expected Date: December/2022.
9. Pump/Motor Degritter # 2 * (208766)	05/29/2017	10455402	Malfunction.	PO 641003622. Expected Date: December/2022.
10. Conveyor Degritters (209331)	06/29/2017	10471396	Corrosion	Not corrected. Expected Date: May/2019.
11. Sum Pump Influent Wet Well Original 3 (1105306)	05/26/2018	38856	Malfunction.	Corrected on 12/19/2018.

Equipment Unit (SAP #)	Date Reported Out of service	Work Order #	Type of Failure	Status at the time of the Assessment Inspection
12. Sum Pump Influent Wet Well Original 3 (1105304)	05/16/2018	38852	Got tripped.	Corrected on 12/19/2018.
13. Filter Press (1107285)	05/18/2018	10453012	Oil leak.	PO 641003655. Expected Date: December/2019.
14. BNR Clarifier # 1 (No SAP #)	10/30/2015	10366548	Short-circuit.	PO 641003445. Expected Date: December/2019.
15. Clarifier # 1 – Arm (209653)	03/04/2017	10368441	Broken rubber.	PO 641003445. Expected Date: December/2019.
16. Clarifier # 2 (No SAP #)	05/13/2015	10371891	Short-circuit.	PO 641003445. Expected Date: July/2020.
17. Clarifier # 2 – Arm's Transmission (209654)	03/04/2016	10381900	Broken rubber.	PO 641003445. Expected Date: July/2020.
18. Influent Flow Meter BNR (1121292)	07/20/2017	10478070	Wrong reading.	Eliminated.
19. Sum Pump Equalization Tank # 2 (208446)	04/18/2018	38842	Malfunction.	Damaged. New unit will be installed. Expected Date: December/2020.
20. Blower BNR # 1 (1104338)	12/18/2017	38803	Malfunction.	Corrected on 06/02/2018.
	09/02/2017	10488484	Oil leak.	PO 642021253. Expected Date: June/2020.
21. Blower BNR # 2 (208945)	12/18/2017	38804	Malfunction.	Corrected on 06/04/2018.
	09/02/2018	10450495	Oil leak.	Corrected on 12/12/2018.

Equipment Unit (SAP #)	Date Reported Out of service	Work Order #	Type of Failure	Status at the time of the Assessment Inspection
22. Motor-Blower EQ # 2 (208949)	06/09/2017	10399438	Pulley/oil leak.	Not corrected. Expected Date: July/2020.
	12/18/2017	38807	Malfunction.	Not corrected. Expected Date: July/2020.
23. Pump/Motor Recirculation BNR # 2 (1134626)	05/18/2018	38843	Screws.	Not corrected. Expected Date: June/2019.
24. Flow meter SLA (old plant) (No SAP #)	05/20/2017	10467265	Failure.	Eliminated.
25. Drainage valve # 1 (No SAP #)	03/16/2017	10381905	Malfunction.	Not corrected. Expected Date: June/2020.
26. Waste Discharge Valve BNR (No SAP #)	05/31/2017	10467839	Adjustment.	Corrected on 02/14/2019.
27. Dry Pit Valve (No SAP #)	07/17/2017	10475366	Malfunction.	Corrected on 02/27/2019.
28. Illumination pole (No SAP #)	07/15/2017	10476238	Improper positioning.	Eliminated.
29. Air pipe SLA (No SAP #)	01/26/2017	10440643	Malfunction.	Not corrected. Expected Date: February/2020.
30. Chlorine contact chamber # 1 (No SAP #)	08/20/2017	10483297	Adjustment.	Corrected on 02/08/2019.
31. Chlorine contact chamber # 2 (No SAP #)	08/20/2017	10483334	Adjustment.	Corrected on 02/14/2019.
32. Blower BNR # 3 (208946)	-----	38805	-----	Corrected on 07/11/2018.

* PRASA will considered a rehabilitation project. After the pass of Hurricane Maria, degritter units were replaced and again affected by a flood event. According to PRASA, it is a recurrent situation, the most recent event occurred last week.

- B. Equipment and/or treatment units identified in poor operational conditions during the Assessment Inspection conducted on April 4, 2019, were identified as per Form AAA- 48, and are summarized in the following table:

Equipment/Unit	SAP #	Date Reported Out of service	Notification #	Comment
1. Blower # 2 (original plant).	208951	03/01/2019	10565960	Malfunction. Expected Date: June/2020.
2. Pump/Motor Non-Potable Water # 1.	1136537	02/25/2019	10564350	Malfunction Expected Date: December/2020.
3. Digester.	No SAP #.	03/20/2019	10566555	Clogged diffusers. Expected Date: June/2020.

V. CONCLUSION

The inspection revealed that several process units were out of service or under repair. Please note that **Part 5 of Attachment B: Standard Conditions** of the permit requires the permittee to properly operate and maintain all facilities and systems for collection and treatment (and related appurtenances) which are installed or used to achieve compliance.

PRASA must submit a compliance plan in order to correct the above-mentioned deficiencies on Section IV.



INSPECTOR SIGNATURE

04/25/2019
DATE



SUPERVISOR SIGNATURE

4/25/19
DATE